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August 14, 2024

DELIVERED VIA ECF

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20D
New York, New York 10007-1312

Case Title: *Zahid Alizada v. Ilgar Talibov., et al.,*
Case No. 1:23-cv-5484-CM-OTW
Re: **Joint Request for Extension of Discovery Deadline**

Your Honor:

This office represents Plaintiff, Zahid Alizada, in this matter. We write jointly with Defendant, Ilgar Talibov, to request that the fact discovery deadline and deadline to conduct depositions both be extended to September 30, 2024. The current fact discovery deadline is September 5, 2024, and the current deadline for depositions is August 29, 2024. (Dkt. No. 43).

The parties have engaged in limited discovery in preparation of the parties' mediation scheduled for August 21, 2024, and seek to refrain from conducting depositions or engaging in further discovery to avoid incurring additional and substantial expenses of time and resources prior to attempting to resolve this matter at mediation. However, refraining from further discovery and depositions until after mediation will leave the parties with only eight days to conduct depositions and with only two weeks to complete all of fact discovery.

In light of the foregoing, the parties respectfully request that the deadline for depositions and fact discovery be extended until September 30, 2024. This is the parties' first request for such an extension. All parties consent to this request and the proposed extension. We thank Your Honor for your attention to this matter.

Respectfully submitted,

By: /s/ David Michael Stuart Jenkins
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SO ORDERED.

Dated: _____

Hon. Ona T. Wang
United States Magistrate Judge